

1 the time the Department of Education assumed the
2 responsibility for the project, this Administration.

3 Q All right. We are going to talk about that in a
4 moment, okay? I don't want to get ahead of it. I am still
5 with Mr. McDonald's letter, so I just want to be clear that
6 Mr. McDonald was not complaining about anything that DRC
7 either did fail to do or did improperly in connection with
8 the schools.

9 A In that case the point presented was to the
10 Department of Education.

11 Q What do you mean?

12 A That what is stated in the top of page number 2 is
13 the lack of computers in the classroom.

14 Q All right. And that was just a problem of the
15 Department of Education?

16 A Yes, Sir.

17 Q All right. Now in fact, if we look at the Anderson
18 report which is also here in this book. It is part of Tab 1.
19 The Anderson report is dated October 17, 2001. Is that not
20 right?

21 A You are right.

22 Q And is it not true that the Anderson report
23 involved an investigation of the schools that took place
24 between August 23 and September 1 of the year 2000?

25 A Yes, this is the report of whatever they audited.

1 Q And in that report there is nothing about DRC doing
2 something wrong or not doing something that it was supposed
3 to do?

4 A The report states that most of the work was done.

5 Q Was done?

6 A Ah-huh.

7 Q Was that most of the work that DRC was supposed to
8 do?

9 A Ah-huh.

10 Q Yes?

11 A In terms of completion of the cutting edge date and
12 in terms of the deployment, but it didn't and the tests that
13 were presented by the suppliers, also.

14 Q That was all done?

15 A Ah-huh.

16 Q All right. So can we then agree that having read
17 both the Arthur Anderson answer report for the portion of
18 Puerto Rico anyway and the McDonald letter, we can agree that
19 Mr. McDonald was not complaining about anything that DRC was
20 supposed to do, had not done or had done improperly?

21 A In terms of McDonald's approach, it is right.

22 Q Now, you told me just a little while ago that you
23 went to Washington to meet with USAC on January 15th, 2002 to
24 discuss a response to Mr. McDonald's concerns.

25 A Ah-huh.

1 Q Now, how is it then that DRC becomes involved in
2 your discussions with USAC if Mr. McDonald was not
3 complaining about anything that DRC either did, failed to do
4 or did improperly?

5 A Well, as I told you before in the prior deposition,
6 when we.. In that case, when I became the Director of OSIATD
7 I took for good the word that everything was all right and
8 ready for making the thing work. So we start a connection of
9 schools to begin on July the 1st of that 2001, but it
10 happened that when we started making the connections it
11 didn't work in the way it should be. So that is why we have
12 to go back and make an assessment of what was the real state
13 of the work in that project.

14 That was the research done by Adonay Ramirez'
15 office and it happened that whatever we presumed in terms of
16 the operational ability of the net was not. At the same time
17 we continued moving on with the training area, with the
18 acquisition of computers and with whatever was supposed to be
19 done. But the connectivity of the schools was not working so
20 in the presentation we made to USAC, the approach was to let
21 them know the state of the project when we got it and
22 whatever we were doing to prove that we were taking care of.

23 No matter which was the state that we received it,
24 we were trying to make it operational and working. And one
25 of the parts that was not directly stated in Mr. McDonald's

1 letter but that was halting us in terms of making the project
2 operational is that there was no real connectivity at the
3 schools.

4 The problem with the electric power and all kind of
5 problems at the end of the day, the schools were not
6 connected. And the ones that we did connect in the morning
7 and sometimes even in the afternoon, they were disconnected
8 again and it was in the part concerning the supplier.

9 Then we wanted to show USAC we had done a lot of
10 things but still if you go and try to test it, you are going
11 to find out that no matter what we are doing, there is no
12 real connectivity. The students in the schools cannot
13 connect.

14 Q So you blame it on DRC?

15 A I blame it in whichever was part of the blame that
16 was on the Department of Education. There was in terms of
17 infrastructure and there was part of the blame that was in
18 the suppliers because the project was not operational, when
19 it is supposed to be. That work was done with the suppliers.
20 So we blame that part in the suppliers. We gave all the
21 evidence that we had at that time, to prove our point.

22 Q What ever you told USAC was based on the
23 investigation and the report prepared by Mr. Adonay Ramírez?

24 A Most of them, yes.

25 Q Okay, I think I already asked you this and you

1 identified this document as being yours. Prepared by you.
2 I am referring to a document entitled "Puerto Rico Department
3 of Education Status of Network E-Rate Funded Project" of
4 January 18th, 2002 which is part of tab 3 of Exhibit 1.

5 I'll tell you what. Let me make a copy of that
6 document since we are going to be talking about that for a
7 little bit and I'll give a copy to everybody.

8 OFF RECORD

9 After the recess,

10 BY MR. CAMILO K. SALAS:

11 Q I need to ask you some questions about this
12 executive summary of your visit to Washington on April 26th,
13 2002. Look at page 4 and it indicates there that you had
14 made promise or agreed to continue your efforts to fix the
15 project by doing several things which are listed there on 1
16 through 7. Item number 2 was what?

17 A To produce a preparation plan in order to
18 rehabilitate and connect schools with wireless infrastructure
19 of Phase 2.

20 Q Would it be fair to say that at least at that time
21 on April 26th, 2002 you told USAC that you were going to put
22 the wireless infrastructure that was in Phase 2 schools back
23 to work?

24 A We would try to recover all the schools that
25 weren't in the wireless Phase 2, yes.

1 Q Using the wireless technology?

2 A Not exactly, because with the wireless we are
3 having the problem with electricity, with power. So we would
4 try to keep the most we can of the investment done by the
5 project. But made whatever changes are viable in order to
6 avoid that problem and make some sort of high rig using
7 wireless. The wireless part that we could save of the wired
8 infrastructure in terms to make it work.

9 Q What was the problem with the electricity?

10 A That most of the wireless part of the project used
11 electricity in terms of the access point. All of them need
12 electricity. If I had no electricity in that place, there is
13 no way that I can make it work.

14 Q Could you not just run electrical connections to
15 the places where the access points were located?

16 A It included that. The thing is that I didn't have
17 the money because first it was not part of my office to
18 produce the electricity.

19 Q Then whose job was it?

20 A OMEP or Public Buildings.

21 Q And why would they not do it? Was a request ever
22 made from the Department of Education to OMEP to go and
23 provide electrical connections where needed to make the
24 wireless system work?

25 A Yes, we talked about that in a few meetings we had

1 with the people of OMEP that we were having that problem.

2 Q And why did they not do it?

3 A They did part of the job. The thing is that there
4 were almost 1,500 schools that they had to check and OMEP had
5 part of it and Public Buildings had the other part.

6 Q Go ahead and finish.

7 A I do remember that we even used part of some
8 federal money for schools to attend electricity problems.
9 That project was conducted by OMEP but I remember that it was
10 something like \$10,000,000.00 or something like that. That
11 was assigned for schools because we mentioned it in the
12 presentations we made. We mentioned that that money was used
13 for dealing with the electricity problems in the schools.

14 Q What was needed to be connected were the power
15 points?

16 A And the location of most of what they call the
17 black boxes and the servers that were in inappropriate places
18 and that were having a lack of electricity connections were
19 done in a poor shape and also out of the places they should
20 be. There were some of them...

21 I remember I discovered that with the suppliers
22 when we attempted to make a recovery project early in
23 September or October of 2001. They even presented to the
24 Department of Education a prototype of what they think should
25 be done to make the system operational.

1 Q Are you saying that in order to move the equipment
2 to other locations, different electrical connections had to
3 be provided in the schools?

4 A Even if they were going to be used in the same
5 locations that were not the appropriate, but even if we were
6 going to use it there, they were still having problems with
7 electric power.

8 Q And what kind of problem was that?

9 A This is my opinion, okay?

10 Q Okay.

11 A And I am not electric expert. But these schools
12 were designed when most of the equipment that you could have
13 in a school was a typewriter or so and suddenly, you have a
14 lot of computers and servers going into those same places and
15 sometimes these schools only have one outlet. One outlet
16 that is in serial with six other rooms in the same wing.
17 It's like you are trying to run 5 greyhounds in a bus trailer
18 5 feet wide. It just doesn't work.

19 Q It overloads the circuits, right?

20 A Yes.

21 Q And---

22 A And other than that it is that sometimes they do
23 have the highway but they didn't locate the infrastructure in
24 the highway.

25 MR. A.J. BENNAZAR: Who is "they"?

1 BY MR. CAMILO K. SALAS:

2 A (DEPONENT) The suppliers. They located the places
3 in the rooms that were not appropriate to use for that
4 connection.

5 Q Sometimes they had them in the highway you say?

6 A No. I am just using the analogy. They had a good
7 infrastructure somewhere in the school but the infrastructure
8 of the project was not installed there but in the other side
9 of the school or in another wing of the school or in a room
10 that wasn't appropriate for that.

11 Q Now, how much was the Department of Education
12 trying to get USAC to upgrade the electrical systems and
13 connections?

14 A That specific project, to the best of my
15 recollection, I think that was \$10,000,000.00. But I am not
16 sure. The figure sounds like something like that and that
17 was some federal money that was given to schools in order to
18 work with the infrastructure and the priority was assigned to
19 electricity to make the project work.

20 I am not sure about the figure, but I am sure about
21 the approach because we presented that approach to USAC and
22 to the FCC in terms of "hey people, we are doing whatever we
23 can do to make this work," including electricity.

24 Q And those \$10,000,000.00 would have made the school
25 electrical systems better but it still would not have taken

1 care of all the problems?

2 A I think that... I was just taking care of the
3 project and I was doing whatever was possible to do to make
4 the project work.

5 If it fixed all the parts of the schools or
6 whatever, I am not... As I told you I am not an expert in
7 electricity but I was just looking... I want my project to
8 win.

9 Q Well, let me rephrase the question. Would your
10 project, the computer's project would have been fully
11 satisfied with \$10,000,000.00 worth of work in all of the
12 schools?

13 A No, Sir.

14 Q You needed more money, right?

15 A Yes, Sir.

16 Q Do you have any idea of how many more millions of
17 dollars would have been needed to be invested in the schools
18 to support the computer project that you headed off?

19 A I don't have a figure. But it was a huge amount
20 and the other part that were there, there is almost no way
21 that you can use a transformer in the school and say "hey,
22 nobody else is going to use this electricity that is coming
23 to the school, but the computers."

24 You do something like that and then the Science
25 Teacher is going to have a fan and the Home Economics Teacher

1 is going to get a freezer or something like that and
2 everybody that doesn't have an electrical appliance will
3 bring something to school to do that.

4 So even though we fixed that, there is no way that
5 we can control that this fix is only for the project. Even
6 though we were trying to make it available to the project
7 because I know because I know it is that if I don't have any
8 electricity, the project is dead.

9 Q What you are telling me I think is, and correct me
10 if I am wrong, is that really the entire electrical system in
11 each school had to be totally upgraded?

12 A Not in each school, but the schools that were old
13 and didn't have the facilities. We had schools that were in
14 a very good shape.

15 Q What percentage of the schools would you say needed
16 a substantial amount of electrical work?

17 A I think you have to check the reports. I don't
18 have the figures.

19 Q Let me again give you the document that we were
20 looking at a little while ago which is the Puerto Rico
21 Department of Education Status on the School Network E-Rate
22 Funded Project from January 18, 2002 and that is part of Tab
23 3 of Exhibit 1.

24 I think I have asked you about this a couple of
25 questions and I don't remember the answer. Is this a

1 document that you prepared?

2 A It is a document that my office and I prepared.

3 Q All right. And what was it that this document was
4 intended to do?

5 A Because of the date---

6 Q Which is what, January 18?

7 A January 18, 2002. For me, it looks like a document
8 to be used in our case with USAC and FCC E-Rate Project.
9 Because all of what this has over here shows either evidence
10 or ways of actions to be performed or they were under
11 performance to make the system work, to make the project
12 work.

13 Q So, basically this was a compilation of any
14 problems that the system had?

15 A I think so.

16 Q At the time?

17 A At the time. It was a summary of whatever I was
18 aware of or somebody in the office was aware of.

19 Q In the section that says "Brief Project
20 Description" starting with the second sentence it says "The
21 project started in 1998-1999 (Year 1) with 760 schools when
22 funds were provided for communication lines, communications
23 equipment and internal connections. Now, that work was done
24 before your Administration arrived?

25 A You are right.

1 Q Now, communication lines refer to what?

2 A T-1s.

3 Q That is what you meant when you wrote the report?

4 Communication lines means T-1s?

5 A T-1s.

6 Q All right. Now, are you sure that there was any
7 funding for T-1s in the first year?

8 A At this moment I am not sure.

9 Q Then it says "communications equipment", that would
10 be what?

11 A The infrastructure of whatever is in the black box.

12 Q What do you mean with "whatever is in the black
13 box?"

14 A There was a router, there were the cards.

15 Q Anything else?

16 A I can't remember, but you can check with Adonay
17 Ramírez who was in charge of them.

18 Q But you are not including the server or anything
19 like that?

20 A I think that the servers came in year number 2. I
21 am not sure at this time but I have the feeling that... I am
22 not sure. Whatever I say, I am not sure in that.

23 Q And internal connections, those would be the
24 connections---

25 A The connections---

1 Q In the schools?

2 A In year number 1 that was the wiring.

3 Q The wiring---

4 A The wiring and the---

5 Q Where you plug the computers---

6 A The drops.

7 Q The drops. Then it says "In 1999-2000 (Year 2)
8 phones were provided for communication lines, communications
9 equipment and internal connections for 780 additional
10 schools. Two servers per school were also funded for a total
11 of 1,560."

12 A Ah-huh.

13 Q That refers to the Phase 2 schools, right?

14 A Excuse me?

15 Q Is that Phase 2 schools that this is talking about?

16 A Yes and I think that the 2 servers per schools
17 additional were for all schools, Phase 1 and Phase 2.

18 Q But in these schools there were no internal
19 connections for the 780 schools, actually?

20 A Well there are internal connections because the
21 access points are considered internal connections. The point
22 is that they are not wired in terms of a wire to the access
23 point to the servers or the black box. But they are a
24 wireless connection.

25 Q So---

1 A And also from the black box to the servers, that
2 part is wired.

3 Q A couple of feet connections?

4 A Yes.

5 Q All right. That was done also before your
6 Administration got there?

7 A You are right.

8 Q Let me just go back then, and ask you with respect
9 to the year 1, at this time did you find any problems with
10 the work that was done in year 1?

11 A When I became the Director?

12 Q Yes.

13 A I took for good the word that the suppliers were
14 giving me that everything was all right and it was not until
15 I tried to connect in July that we start discovering that it
16 is not all like they say it was.

17 The connections were not working the way they told
18 me that they were supposed to be working. I do remember that
19 at that time I had set up 4 generations of what I called V1,
20 V2, V3 and V4. And my expectations at that time, based on
21 the information that the suppliers were giving me was that by
22 the end of December I should have had almost half of the
23 schools of the Department of Education connecting, up and
24 running based on the information that the suppliers were
25 giving me.

1 Before we started on July, we didn't know that
2 things were nothing like they were telling me. So the first
3 month that was in June that I was in the chair---

4 Q I guess what I am trying to ask is a very specific
5 question. We know, I think, what was done during the first
6 year, which at least according to the records I reviewed were
7 internal connections for 760 schools for Phase 1 schools.

8 The specific question is, later on when you got in
9 involved with this project did you receive any information
10 that indicated that the internal wiring, whatever was done
11 during the first year was not done properly?

12 A If the schools were not connecting---

13 Q No. Again, this is a specific question and I want
14 a specific answer, if you can give it to me.

15 A Ah-huh.

16 Q As I understand, during the first year they ran
17 wires and they could take a plug where you hook up your
18 computer and I guess the question is did you obtain any
19 evidence or any information that indicated that that work,
20 the wiring in the little plug or whatever was done during the
21 first year, was not done right?

22 A That is also infallible that the wiring works most
23 of the time because there is no more science than making a
24 connection that if the connection is doing good it is fine.
25 There is no problem with that.

1 Q That was precisely my point---

2 A The only thing you have is to test it with a real
3 signal to check if the connectivity in the cable is working.
4 For that you have to have the signal working. But there is
5 almost no way that it can be done wrong.

6 Q That was exactly my point. With respect to what
7 DRC did the first year which was running these wires in the
8 schools that as you admit now, is almost impossible to do
9 wrong, you really have no evidence that DRC did anything
10 wrong with the work it did during the first year?

11 A In terms from the hub or the switch to the drops, I
12 didn't have evidence for it being operational or not because
13 I have no signal. But for me, most of this work is all
14 right. After we tried, it's all right with that.

15 Q Okay.

16 A The only thing that I can object about this is
17 where it was located and that is another thing.

18 Q All right. I don't remember if I discussed that
19 with you or with another witness but basically, that had to
20 do with putting it too close to the window where it might get
21 wet or putting it in areas that are very cramped?

22 A Or putting it away where it should be close to the
23 libraries or away from the T-1s. I think something like
24 that.

25 Q But we will talk about that in a moment, okay?

1 A That part that you are telling is in page number 4,
2 "servers and communications equipment were installed in
3 inappropriate areas."

4 Q Page 4? Okay, item number 2. "Servers and
5 communication equipment were installed in inappropriate
6 areas. For instance that would get wet when it rains or that
7 are too small."

8 A There was another concern that was that the black
9 box cabinets, the ones installed in Phase number 1, they had
10 no ventilation. So when the equipment started working up and
11 the heat builds up, the cards burned out. That was corrected
12 in the year number 2. The black box cabinets did have a
13 ventilator.

14 Q But that was raised because they added more
15 equipment to those black boxes that generated additional
16 heat. Is that not right?

17 A As far as I know, the servers were out of the box
18 except for year number... One of the years had 2 servers in
19 the box and 2 on the outside and others had the 4 servers
20 out. So the heat produced by the additional servers were not
21 affecting the cabinet.

22 The problem with the cabinet of year number 1,
23 didn't have a ventilator and of course the heat builds up,
24 there was no air conditioning in those rooms and the T-1
25 cards were burning almost all the time. That is the

1 information we have from Telefónica.

2 Q So the cards were burning while the black boxes
3 contained only the routers and the cards. That is what you
4 are telling me?

5 A It was year number 1. Whatever was contained on
6 that. It was in the cabinets installed in year number 1.

7 Q And who was telling you that?

8 A Telefónica, PRT.

9 Q And when were they telling you that?

10 A When it started burning.

11 Q Which was when?

12 A After... I think that was... It began with the
13 connections that started in July, but when we started
14 connecting most of the schools then it started burning.

15 Q That's in 2002, right?

16 A The huge part of Telefónica was in 2002.

17 Q That's when they started to burn?

18 A No, they started... Even with the first clusters,
19 the small clusters they had at the beginning when they were
20 trying... Both suppliers were trying to show us how it can be
21 recovered, the project. But the huge part of the Phase 1
22 schools connected in 2002.

23 Q Regardless of the date, then what you are telling
24 me is that the cards were burning whenever they were trying
25 to connect the Phase 1 schools?

1 A That's what they told me.

2 Q And who told you that?

3 A Telefónica.

4 Q All right, and Telefónica also told you that they
5 had not added any additional equipment to the black boxes in
6 the process of connecting the Phase 1 schools?

7 A I am not sure. I think no additional equipment
8 was... A power supply... In 2002, I think that a power supply
9 was used into the box but I am not sure. You would have to
10 check with Adonay. He has the details on that.

11 Q Before we go to number 2, just on the heading of
12 that section it says "On September 2001, the consultant
13 presented his report on the status on the school's network.
14 Some of the findings are," first of all, the consultant was
15 Adonay Ramírez, right?

16 A Yes.

17 Q And September, 2001, that refers to the Adonay
18 Ramírez's report?

19 A Yes, Sir.

20 Q Now, Item number 1 says "More than 50% of the
21 communication lines from a sample of 100 schools were not
22 installed, not activated or out of service," right?

23 A Yes, Sir.

24 Q Am I correct that only then 100 schools were
25 sampled?

1 A At that time?

2 Q Yes.

3 A A hundred schools were sampled.

4 Q So that would have been prior to September of 2001,
5 correct?

6 A You are right.

7 Q Yes?

8 A Yes.

9 Q Now the schools that were sampled, were they Phase
10 1 or Phase 2 schools?

11 A Both of them.

12 Q Both of them?

13 A Yes.

14 Q So, are you telling me then that prior to September
15 of 2001 the Phase 2 schools were supposed to have Internet
16 access already?

17 A Remember I told you about the V1 group of schools.
18 That group was extended to 100 schools that we tried to
19 connect and that was a sample we took at that time. But
20 again, Adonay has the details of that.

21 Q What you are saying is that the V-1 group of
22 schools also included Phase 2 schools?

23 A They had both of them, Phase 1 and Phase 2.

24 Q Well, out of this 50% of the 100 schools that were
25 not installed, not activated or out of service, can you tell

1 me how many of those were Phase 2 schools?

2 A No Sir, Adonay might have the details on that. I
3 don't have them.

4 Q Then it goes, Item number 2 says "Service and
5 communication equipment were installed in inappropriate areas
6 that get wet when it rains or that are too small." Again,
7 those servers and communication equipment refer to the 100
8 schools that were sampled?

9 A Yes, Sir.

10 Q And does that refer to Phase 1 or Phase 2 schools?

11 A Both of them.

12 Q Again, from the V1 set of schools?

13 A I think so.

14 Q Can you tell us how many Phase 2 schools had
15 servers and communication equipment installed in
16 inappropriate areas?

17 A No, Sir. You have to go to the details of the
18 report.

19 Q And that would be Adonay Ramírez's report?

20 A It should be in his office.

21 Q Now Item number 5 here says "Multi-year contracts
22 were signed." What does that refer to?

23 A We had reference that we had to double check with
24 the multi-year contracts that were signed and I made a
25 request that if it was all right or not to have multi-year

1 contracts. I wanted to be sure that we were doing nothing
2 wrong with that.

3 At that time I raised a flag to make aware to the
4 people in the Legal Office of the Department and as far as
5 the Auditor's Office to have them check if we were all right
6 or not.

7 Q And when was that you raised the flag?

8 A I think that the first time I think I talked about
9 that was when we were revising the contracts for the year
10 number... Before the 470, the year that was in the bidding
11 process of 2001.

12 Q All right.

13 A So I wanted to be sure that it was all right.

14 Q And what did they tell you from the Legal
15 Department?

16 A That is was not advisable to have these multi-year
17 contracts so I remember I think I talked to Daniel Carmona to
18 check with USAC and I think that we made a note to Lynette
19 Molina.

20 Q You talked to Lynette Molina about that?

21 A Yes.

22 Q About what?

23 A That I wanted to have the information that we were
24 doing right or wrong with using these multi-year contracts.

25 Q Now, the Legal Department told you that it was not

1 advisable to have a multi-year contract, but they didn't tell
2 you that it was illegal to have multi-year contracts?

3 A As far as I remember, I think that nobody told me
4 that it was illegal but that it was not advisable.

5 Q All right.

6 A As far as the best of my recollection, my best
7 recollection was---

8 Q Do you remember who in the Legal Department told
9 you that?

10 A No, Sir.

11 Q Did you get a written opinion from the Legal
12 Department?

13 A I don't think so. If it was an opinion, it should
14 be at the office.

15 Q But you are the one who requested either a verbal
16 or a legal opinion from the Legal Department?

17 A Yes. Also, one of the consultants, Arnaldo Ramos.
18 He was the one that told me first about this.

19 Q So Mr. Ramos also asked for an opinion?

20 A Yes.

21 Q From the Legal Department?

22 A I think so.

23 Q And to your knowledge he also was told the same
24 thing?

25 A I think. But you would have to ask him.

1 Q And then you went to Lynette Molina and you posed
2 the same question to her?

3 A I think so.

4 Q And what did she tell you?

5 A I think that it was not advisable to have such a
6 contract. I remember that there was something, I think that
7 it was in USAC that was related to a date of the year and
8 from that year on it was not advisable to have multi-year
9 contracts or something like that.

10 Q But Lynette Molina certainly did not tell you it
11 was illegal to have a multi-year contract?

12 A Because of my liaison with USAC and whatever
13 information I needed was Daniel Carmona.

14 Q I am sorry, I didn't understand your last answer.

15 A Concerning the aspects of the E-Rate project and
16 USAC the liaison was Daniel Carmona.

17 Q And what did he do for you in connection with this
18 inquiry about whether multi-year contracts were illegal or
19 not?

20 A The best of my recollection on that is that it was
21 not advisable to have multi-year contracts.

22 Q But neither Mr. Carmona nor Lynette Molina told you
23 that it was illegal to have multi-year contracts?

24 A I don't remember that.

25 Q All right. Let's go back to the report that you

1 have in front of you. Item number 7 of page 4 it says
2 "Ineffective technical training was provided. Example, 12
3 weeks in a row Microsoft training to non-technical people."

4 A Ah-huh.

5 Q What does that mean?

6 A Well, I still think that training is not just a
7 role call and I was there and nothing happened. There has to
8 be a transfer of knowledge and the way of the very few
9 information we had from the previous Administration
10 concerning technology was, that there was conducted some
11 training but in terms of having a bunch of people and giving
12 them a lecture and if there was a transfer of knowledge or
13 not, who knows?

14 The only thing was "just sign there and everything
15 is all right because I have, let's say, 100 people sign in
16 the supplied form." So, I started making sure that the
17 training was given in a way that we can be accountable and
18 that at least certain knowledge is transferred.

19 Then I started talking about validation of the
20 training. I wanted to have some sort of a test, some sort of
21 a validation that I can present to anybody interested of
22 knowing in any state where the money was invested and I have
23 accountability that some kind of knowledge transfer was
24 performed.

25 Q So you basically felt that they have had some kind

1 of training sessions where people came, signed their names in
2 but basically left not learning anything?

3 A The information I have and Mr. Ramirez can be more
4 detailed in that, is that this specific concern I am talking
5 about here is that they went like in a Bible. They went to
6 every corner or every junction of the boat and took whatever
7 happened to pass.

8 It didn't matter if it was the janitor, if it was
9 a teacher or whoever it is and they took it and they gave
10 them 3 courses in a row that even for technicians is a hell
11 of a job, to people that can't make any difference from a
12 microwave oven from the monitor.

13 It would be irresponsible from my point being the
14 Director of OSIATD saying that "hey people, we have trained
15 people." I do not have the face to go to USAC and say we
16 have been doing this kind of training. I want to go to USAC
17 and say "we have trained these people and this is the
18 evidence." More than being present, that some sort of a
19 knowledge transfer was performed. So I gave my policy on
20 that. Training had to be accountable for knowledge transfer.

21 Q So basically, the Department of Education had not
22 properly trained the use of the system?

23 A Before we were there, the evidence I had which is
24 very little, was that in terms of technology, that is what
25 had happened.

1 Q So, basically those people would have problems
2 turning the computers on, signing on and doing any kind of
3 research?

4 A I heard and I have to tell you I heard---

5 Q Yes.

6 A Because as I told you before, you can stand up, in
7 front of me in a meeting in a row and I don't know who he is.
8 So, I have no evidence that whatever I heard in the halls or
9 in the computer center that the training was performed that
10 way. That it's the only thing I have.

11 When I started trying to make the net operational,
12 I found out that there were people that were having lack of
13 knowledge. So, if I have to go to the stakeholders, in this
14 case USAC, that they were all the state holders and be
15 responsible for them, I have to get accountable.

16 I can't go here to you and say "I think that this
17 is all right. I think that if somebody else did it, okay.
18 They are going to respond for that." But my point of view
19 here of what I am responsible, I want to be accountable. I
20 want to give you the facts. I want anybody in the phase that
21 I was saying that I was working with some hear say
22 information and who knows if it's bad or not?

23 Q I understand. Then Item number 8 here says "Many
24 school directors did not know about the project, therefore
25 their identification level with the project is very low or

1 non existent. Now, what were you referring to there?

2 A When people from the Department of Education or
3 from the suppliers went to the schools to perform some kind
4 of a job or perform some sort of a project in technology,
5 there were School Directors or Principals that would say
6 "hey, I don't know what the hell is going on with that."

7 So, that shows me that they were not involved on
8 whatever was going on with the E-Rate project and the
9 cooperation they had to perform with the project. So I gave
10 instructions that School Superintendents and School Directors
11 had to be conducted into a meeting to let everybody know what
12 is going on. To make public the policies we have on the
13 information systems.

14 I requested time during that year's first meetings
15 that were conducted in 2 different parts of the Island that
16 we wanted to make a short presentation to the School
17 Principals and to the School Teachers present there to make
18 sure that everybody had information, both by presentation and
19 in reality.

20 Q And part of that included telling the Principals to
21 cooperate with the vendors who were installing equipment,
22 etceteras?

23 A Yes, because I was having complaints from the
24 vendors---

25 Q What complaints?

1 A That they were going into the schools and the
2 School Directors were so protective that they didn't even
3 allow the suppliers to touch it without a letter from the
4 Department of Education and sometimes they didn't have it.

5 So Adonay's office started doing appointments with
6 the School Principals and letting them know in advance that
7 somebody either from DRC or from Telefónica or from whoever
8 is going to be visiting the schools so to be sure that
9 somebody is there, that the janitors are there. If by any
10 chance you are going to be out of the school that day, leave
11 somebody that can make the petition to let the people go in
12 and this kind of efforts in advance.

13 So I don't want anybody going from San Juan to
14 Maricao and just arrive at the school to just discover that
15 the School Principal was not there.

16 Q And that had happened, right?

17 A Yes.

18 Q And other things that also had happened was that
19 some of the vendors would come in to install the equipment
20 and the Principals would insist that the equipment be put in
21 a certain room or area of the school?

22 A Oh, I had a big discussion with the supplier with
23 that. Of course, most of this happened before I was in the
24 chair. But I remember that I brought this into the table and
25 I told them "listen people, you are the experts. You are the